

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In Re:

DMCA SUBPOENA TO TONIC DOMAINS
CORPORATION

Service Provider.

Case No.:

DECLARATION IN SUPPORT OF
ISSUANCE OF DMCA SUBPOENA TO
TONIC DOMAINS CORPORATION
PURSUANT TO 17 U.S.C. § 512(h)

DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA
TO TONIC DOMAINS CORPORATION - 1

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

1 I, ANDREAS ALKIVIADES ANDREOU, hereby declare as follows:

2 1. I am the Director of MG Premium Ltd (hereinafter, “MG”) and am authorized to
3 act on its behalf. I have personal knowledge of the facts contained herein and, if called upon to
4 do so, could and would testify competently thereto.

5 2. MG, also known simply as Mindgeek, is among the world’s leading providers of
6 premium adult entertainment content. Along with its family of companies, MG owns and
7 operates one of the largest portfolios of premium adult-oriented audiovisual content in the
8 world. MG seeks to protect its copyrighted audiovisual works from blatant infringement.

9 3. I have personal knowledge of the copyrights owned by MG and the ongoing
10 infringements of those copyrights that occur on the internet. I also have personal knowledge of
11 the instances that MG’s copyrighted works have been posted without MG authorization on the
12 websites listed in the attached **Exhibit A**.

13 4. MG is requesting for issuance of a Subpoena by the Clerk of this Court, pursuant
14 to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) to Tonic Domains
15 Corporation (“Tonic”) that would order Tonic Domains Corporation to disclose the identities,
16 including names, physical addresses, IP addresses, telephone numbers, e-mail addresses,
17 payment information, account updates and account histories of the users operating the websites
18 listed in the attached **Exhibit A**.

19 5. The purpose for which this subpoena is sought is to obtain the identities of the
20 individuals assigned to these websites who have exploited MG’s exclusive rights in their
21 copyrighted videos without their authorization. This information will only be used for the
22 purposes of protecting the rights granted to MG, the copyright owners, under Title II of the
23 Digital Millennium Copyright Act.

24 6. On February 19, 2021, authorized agent for MG Jason Tucker issued and served a
25 copyright infringement notification on Tonic’s Agent. Pursuant to Section 512(c)(3)(A), the
26 notification was properly signed by MG’s agent, identified the copyrighted material being

1 infringed, set forth a listing of the URLs containing posts of infringing material, confirmed that
2 such use of MG's copyrighted works was not authorized by MG, and gave contact information
3 such that the DMCA Agent could reach him with questions. A true and correct copy of the
4 February 19, 2021 notification is attached as **Exhibit B**.

5
6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct.

8
9 DATED this 2nd day of March, 2021, at Nicosia, Cyprus.

10
11 
12 _____
13 ANDREAS ALKIVIADES ANDREOU
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Exhibit A

**List of all websites using MG Premium Ltd.'s
work**

EXHIBIT A

Domains:

Freeomovie.to

Gaypornhdfree.to

Goodporn.to

Letsjerk.to

Xtapes.to

Yespornplease.to

| Website | Infringing Title | Infringing URL |
|------------------|---|---|
| Goodporn.to | BRAZZERS LIVE 10: RUFF'N'TUFF - 02/10/2011 | https://goodporn.to/videos/9162/brazzers-live-10-ruff-n-tuff-02-10-2011/ |
| Goodporn.to | BRAZZERS LIVE 34: BIGGER & BLONDER - 03/20/2013 | https://goodporn.to/videos/9192/brazzers-live-34-bigger-blonder-03-20-2013/ |
| Goodporn.to | BRAZZERS LIVE 35: VERONICA'S FANTASY - 04/30/2013 | https://goodporn.to/videos/9197/brazzers-live-35-veronica-s-fantasy-04-30-2013/ |
| Goodporn.to | BRAZZERS LIVE 31: HO HO HOES! - 12/13/2012 | https://goodporn.to/videos/9189/brazzers-live-31-ho-ho-hoes-12-13-2012/ |
| Xtapes.to | Sand And Sweat, Part 2 Alexis Fawx | https://en.xtapes.to/36238/sand-and-sweat-part-2-alexis-fawx/ |
| Xtapes.to | Sand And Sweat, Part 1 Alexis Fawx, Olive Glass | https://en.xtapes.to/36238/sand-and-sweat-part-1-alexis-fawx-olive-glass/ |
| Xtapes.to | Alone With BFs Pervy Roommate Adria Rae, Keiran Lee | https://en.xtapes.to/36238/alone-with-bfs-pervy-roommate-adria-rae-keiran-lee/ |
| Gaypornhdfree.to | Harbey & Ryan - Ryan Bones & Harvey Sid | https://gaypornhdfree.to/2021/02/harvey-ryan-ryan-bones-harvey-sid/ |
| Gaypornhdfree.to | Real Men Wear Kilts: Bareback | https://gaypornhdfree.to/2020/03/jonas-jackson-leander-real-men-wear-kilts-bareback/ |
| Gaypornhdfree.to | Dick Swap Part 2 | https://gaypornhdfree.to/2021/02/alex-mecum-colton-grey-jeremy-spreadums/ |

| | | |
|------------------|---|---|
| Freeomovie.to | Busty Latin Beauties | https://www.freeomovie.to/busty-latin-beauties/ |
| Letsjerk.to | 4418021 - Anal Stretching In The Shower | https://letsjerk.to/alena-croft-scott-nails-anal-stretching-in-the-shower/ |
| Letsjerk.to | 4418027 - Bump In The Night | https://letsjerk.to/danny-d-emily-blake-bump-in-the-night/ |
| Letsjerk.to | Teens Like It Big Vol. 23 | https://letsjerk.to/dirty-and-clean-in-college-bailey-brook/ |
| Letsjerk.to | Baby Got Boobs Vol. 19 | https://letsjerk.to/jimena-puts-on-a-show-jimena-lago/ |
| Letsjerk.to | Baby Got Boobs Vol. 19 | https://letsjerk.to/post-workout-smoothie-ashly-anderson/ |
| Letsjerk.to | 4418370 - Best of Brazzers Pantyhose | https://letsjerk.to/preppies-in-pantyhose-part-1-ariana-marie-chanel-preston/ |
| Letsjerk.to | 4418012 - My Three Wives: Remastered | https://letsjerk.to/katy-jayne-a-very-happy-ending/ |
| | | |
| Yespornplease.to | Big Tits at School Vol. 7 | https://yespornplease.to/en4/v/85906 |
| Yespornplease.to | 8194 - Beautiful Bounce | https://yespornplease.to/en4/v/88197 |
| Yespornplease.to | 3903 - Resisting Anal Arrest Pt 2 | https://yespornplease.to/en4/v/74695 |

Exhibit B

**Copies of Notifications Issued Pursuant to
17 U.S.C. § 512(c)(3) to
Registered DMCA Agent for
Service Provider Tonic Domains Corporation**

Jason Tucker

From: Jason Tucker [REDACTED]
Sent: Friday, February 19, 2021 10:28 AM
To: hostmaster@tonic.to
Cc: [REDACTED]
Subject: DMCA Takedown Notice for Copyright Infringement - Mindgeek

via Email:

RE: DMCA Takedown Notice for Copyright Infringement – Mindgeek

Dear Copyright Agent,

I, Jason Tucker, hereby declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge and belief the following is true and correct and I have the authority to act on behalf of the owner of the copyrights involved.

I have a good faith belief that the use of materials identified below is not authorized by the Owner and therefore infringes on its rights pursuant to copyright law. Pursuant to this notification, you should immediately take steps to locate and remove and/or disable access to the content that is on your system.

If you are a service provider, you may otherwise be liable for copyright infringement if, upon obtaining knowledge or awareness of infringing material being stored upon your network, you do not act expeditiously to remove, or disable access to, the material.

My contact information is as follows:

MG Premium Ltd.

c/o: Battleship Stance, Inc. - Jason Tucker

Address: [REDACTED] Phoenix, AZ 85016 USA

Email: [REDACTED]

Location of original works owned by and registered to MG Premium Ltd: <https://www.pornhubpremium.com/>

This correspondence and all of its contents is without prejudice to MG Premium Ltd. or any of their affiliated company's rights and remedies, all of which are expressly reserved.

Sincerely,

s/Jason Tucker

Jason Tucker

Agent for MG Premium Ltd.; MG Limited Cyprus; MG Content DP Ltd; MG Content RK Limited; MG Freesites Ltd

Links to Infringing Material that we request be REMOVED:

<https://goodporn.to/videos/9162/brazzers-live-10-ruff-n-tuff-02-10-2011/>

<https://goodporn.to/videos/9192/brazzers-live-34-bigger-blonder-03-20-2013/>

<https://goodporn.to/videos/9197/brazzers-live-35-veronica-s-fantasy-04-30-2013/>
<https://goodporn.to/videos/9189/brazzers-live-31-ho-ho-hoes-12-13-2012/>
<https://en.xtapes.to/36238/sand-and-sweat-part-2-alexis-fawx/>
<https://en.xtapes.to/36238/sand-and-sweat-part-1-alexis-fawx-olive-glass/>
<https://en.xtapes.to/36238/alone-with-bfs-pervy-roommate-adria-rae-keiran-lee/>
<https://letsjerk.to/alena-croft-scott-nails-anal-stretching-in-the-shower/>
<https://letsjerk.to/danny-d-emily-blake-bump-in-the-night/>
<https://letsjerk.to/dirty-and-clean-in-college-bailey-brook/>
<https://letsjerk.to/jimena-puts-on-a-show-jimena-lago/>
<https://letsjerk.to/post-workout-smoothie-ashly-anderson/>
<https://letsjerk.to/preppies-in-pantyhose-part-1-ariana-marie-chanel-preston/>
<https://letsjerk.to/katy-jayne-a-very-happy-ending/>
<https://www.freemovie.to/busty-latin-beauties/>
<https://gaypornhdfree.to/2021/02/harvey-ryan-ryan-bones-harvey-sid/>
<https://gaypornhdfree.to/2020/03/jonas-jackson-leander-real-men-wear-kilts-bareback/>
<https://gaypornhdfree.to/2021/02/alex-mecum-colton-grey-jeremy-spreadums/>
<https://yespornplease.to/en4/v/74695>
<https://yespornplease.to/en4/v/85906>
<https://yespornplease.to/en4/v/88197>

Jason Tucker

SKYPE: [REDACTED]

Twitter: @IntelPropHQ

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Virus-free. www.avg.com